UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION AT CINCINNATI, OHIO

Monica F. Jackson :

Plaintiff, : Case No. 1:19-cv-00629

v. : Judge Douglas R. Cole

: Magistrate Judge Stephanie K. Bowman

General Electric Aviation

: MOTION FOR LEAVE OF COURT TO

Defendant : FILE SEALED DOCUMENT,

PURSUANT TO LOCAL RULE 5.2.1(a)

Now comes counsel Robert A. Steinberg and Terrence L. Goodman, and respectfully request that the Court grant them permission to file electronically a sealed document relating to the confidential settlement in this case.

MEMORANDUM

On January 27, 2020, the Court entered an Order dismissing this case with prejudice due to the settlement of the case. "The Court expressly and explicitly retains jurisdiction to the enforce the settlement agreement of the parties." (Doc #: 16). The motion that the undersigned wish to file under seal relates to the enforcement of the settlement agreement of the parties. To divulge the substance of the motion would violate the confidentiality of the settlement agreement. Local Rule 5.2.1(a) requires counsel to obtain leave of Court upon motion and for good cause shown in order to file a sealed document.

The Court has already determined that post-dismissal documents are appropriate to file in this case under seal. On March 9, 2020, the court granted

Defendant's Motion to Release the Settlement Conference Transcript. The Court authorized its release "to the parties in this action ONLY," and ordered the transcript filed under seal. (Notation Order granting [17]). We understand that we will receive instructions as to how to make an electronic filing of a sealed document.

Respectfully Submitted,
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel via the CM/ECF system on the date of filing this Motion and served upon Plaintiff via regular mail.

/s/ Robert A. Steinberg
Robert A. Steinberg